

Fill in this information to identify the case

Debtor 1 Andrew D. Breighner

Debtor 2 Gaylynn L. Breighner  
(Spouse, if filing)

United States Bankruptcy Court for the: MIDDLE District of PENNSYLVANIA  
(State)

Case number 15-03172

Form 4100R

Response to Notice of Final Cure Payment

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Part 1: Mortgage Information

Name of creditor: U.S. Bank National Association, as Indenture Trustee on behalf of and with respect to Ajax Mortgage Loan Trust 2018-B, Mortgage-Backed Notes

Court claim no. (if known):

6

Last 4 digits of any number you use to identify the debtor's account: -513

Property address: 305 High Rock Road  
Number Street

Hanover PA 17331  
City State Zip Code

Part 2: Prepetition Default Payments

Check one:

- ☒ Creditor agrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim.
- ☐ Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is: \$ \_\_\_\_\_

Part 3: Postpetition Mortgage Payment

Check one:

- ☐ Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.
- The next postpetition payment from the debtor(s) is due on:       /      /        
MM/DD/YYYY
- ☒ Creditor states that the debtor(s) are not current on all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.
- Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- a. Total postpetition ongoing payments due: (a) \$1,567.54
- b. Total fees, charges, expenses, escrow, and costs outstanding: (b) \$500.00
- c. Total. Add lines a and b. (c) \$2,067.54

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on: 03/01/2020  
MM/DD/YYYY

**Part 4: Itemized Payment History**

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges, expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

- ☐ all payments received;
- ☐ all fees, costs, escrow, and expenses assessed to the mortgage; and
- ☐ all amounts the creditor contends remain unpaid.

**Part 5: Sign Here**

**The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim.**

Check the appropriate box.

- ☐ I am the creditor.
- ☐ I am the creditor's authorized agent.

**I declare under penalty of perjury that the information provided in this Notice is true and correct to the best of my knowledge, information, and reasonable belief.**

**x** /s/ Karina Velter Date March 24, 2020  
Signature

Print: Karina Velter Title Attorneys for Creditor

Company Manley Deas Kochalski LLC

Address P.O. Box 165028  
Number Street

Columbus, OH 43216-5028  
City State ZIP Code

Contact phone 614-220-5611 Email amps@manleydeas.com

**Exhibit B: Schedule of Amounts Outstanding Post-Petition Claim**

Description		Dates incurred	Amount	
1.	Late charges	_____	(1)	\$ _____
2.	Non-sufficient funds (NSF) fees	_____	(2)	\$ _____
3.	Attorney's fees	March 24, 2020	(3)	\$ 500.00
4.	Filing fees and court costs	_____	(4)	\$ _____
5.	Advertisement costs	_____	(5)	\$ _____
6.	Sheriff/auctioneer fees	_____	(6)	\$ _____
7.	Title costs	_____	(7)	\$ _____
8.	Recording fees	_____	(8)	\$ _____
9.	Appraisal/broker's price opinion fees	_____	(9)	\$ _____
10.	Property inspection fees	_____	(10)	\$ _____
11.	Tax advances (non-escrow)	_____	(11)	\$ _____
12.	Insurance advances (non-escrow)	_____	(12)	\$ _____
13.	Escrow shortage or deficiency (Do not include amounts that are part of any installment payment listed in Part 3.)	_____	(13)	\$ _____
14.	Property preservation expenses. Specify: _____	_____	(14)	\$ _____
15.	1 payment at \$1,711.97.	March 1, 2020	(15)	\$ 1,711.97
16.	Other. suspense _____	_____	(16)	\$ (144.43)
Total postpetition fees, expenses, and charges. Add all of the amounts listed above.			(17)	\$ 2,067.54

## Post Petition Payment History for:

Andrew D. Breighner  
BK Case No. 15-03172

Loan N **Redacted**

BK filing date	7/28/2015	Post petition DueDate	3/1/2020	Suspense Balance:	(\$144.43)
AP order effective date	8/1/2016	Total Original PP Default (stuffed into plan)	\$18,534.24	Stip Balance Due:	\$0.00
PITI amount	\$1,711.97	No. Months Behind	1	Regular Payments Balance Due	\$1,711.97
				NSF Fee	\$0.00
Pmt Start	\$1,459.02			Attorney fees due	\$500.00
NOPC eff 12/2016	\$1,574.79			<b>TOTAL PP DEFAULT AMOUNT</b>	<b>\$2,067.54</b>
NOPC eff 12/2017	\$1,587.61				
NOPC eff 6/2019	\$1,653.19				
NOPC eff 2/2020	\$1,711.97				

Reference	DateRec	DateDue	Total	Principal	Interest	Impound	UnpaidIntere
POSTBWR	8/29/2016	8/1/2016	\$1,500.00	\$143.32	\$980.32	\$376.36	\$40.98
POSTBWR	9/23/2016	9/1/2016	\$1,460.00	\$144.05	\$939.59	\$376.36	\$0.98
POSTBWR	10/21/2016	10/1/2016	\$1,460.00	\$144.79	\$938.85	\$376.36	\$0.98
POSTBWR	11/22/2016	11/1/2016	\$1,459.02	\$145.53	\$937.13	\$376.36	\$0.00
POSTBWR	12/15/2016	12/1/2016	\$1,574.79	\$146.27	\$936.39	\$492.13	\$0.00
POSTBWR	1/26/2017	1/1/2017	\$1,575.00	\$147.02	\$935.85	\$492.13	\$0.21
POSTBWR	2/23/2017	2/1/2017	\$1,575.00	\$147.77	\$935.10	\$492.13	\$0.21
POSTBWR	3/22/2017	3/1/2017	\$1,575.00	\$148.52	\$934.35	\$492.13	\$0.21
POSTBWR	4/19/2017	4/1/2017	\$1,574.79	\$149.28	\$933.38	\$492.13	\$0.00
POSTBWR	5/17/2017	5/1/2017	\$1,574.79	\$150.04	\$932.62	\$492.13	\$0.00
POSTBWR	6/28/2017	6/1/2017	\$1,575.00	\$150.81	\$932.06	\$492.13	\$0.21
POSTBWR	7/26/2017	7/1/2017	\$1,575.00	\$151.58	\$931.29	\$492.13	\$0.21
POSTBWR	8/23/2017	8/1/2017	\$1,575.00	\$152.35	\$930.52	\$492.13	\$0.21
POSTBWR	9/22/2017	9/1/2017	\$1,575.00	\$153.13	\$929.74	\$492.13	\$0.21
POSTBWR	10/18/2017	10/1/2017	\$1,574.79	\$153.91	\$928.75	\$492.13	\$0.00
POSTBWR	11/15/2017	11/1/2017	\$1,575.00	\$154.70	\$928.17	\$492.13	\$0.21
POSTBWR	12/27/2017	12/1/2017	\$1,587.61	\$155.48	\$927.18	\$504.95	\$0.00
POSTBWR	1/24/2018	1/1/2018	\$1,588.00	\$156.28	\$926.77	\$504.95	\$0.39
POSTBWR	2/21/2018	2/1/2018	\$1,588.00	\$157.08	\$925.97	\$504.95	\$0.39
POSTBWR	3/21/2018	3/1/2018	\$1,590.00	\$157.88	\$927.17	\$504.95	\$2.39
POSTBWR	4/18/2018	4/1/2018	\$1,590.00	\$158.68	\$926.37	\$504.95	\$2.39
POSTBWR	5/30/2018	5/1/2018	\$1,590.00	\$159.49	\$925.56	\$504.95	\$2.39
POSTBWR	6/27/2018	6/1/2018	\$1,587.61	\$160.31	\$922.35	\$504.95	\$0.00
POSTBWR	7/30/2018	7/1/2018	\$1,587.61	\$161.13	\$921.53	\$504.95	\$0.00

## Post Petition Payment History for:

Andrew D. Breighner  
BK Case No. 15-03172

Loan No.

Redacted

POSTBWR	8/31/2018	8/1/2018	\$1,590.00	\$161.95	\$923.10	\$504.95	\$2.39
POSTBWR	9/28/2018	9/1/2018	\$1,590.00	\$162.77	\$922.28	\$504.95	\$2.39
POSTBWR	10/31/2018	10/1/2018	\$1,590.00	\$163.61	\$921.44	\$504.95	\$2.39
POSTBWR	11/30/2018	11/1/2018	\$1,590.00	\$164.44	\$920.61	\$504.95	\$2.39
POSTBWR	12/31/2018	12/1/2018	\$1,590.00	\$165.28	\$919.77	\$504.95	\$2.39
NSF	1/2/2019	12/1/2018	(\$1,590.00)	(\$165.28)	(\$919.77)	(\$504.95)	(\$2.39)
POSTBWR	1/11/2019	12/1/2018	\$1,590.00	\$165.28	\$919.77	\$504.95	\$2.39
POSTBWR	1/31/2019	1/1/2019	\$1,590.00	\$166.12	\$918.93	\$504.95	\$2.39
NSF	2/1/2019	1/1/2019	(\$1,590.00)	(\$166.12)	(\$918.93)	(\$504.95)	(\$2.39)
POSTBWR	2/15/2019	1/1/2019	\$1,590.00	\$166.12	\$918.93	\$504.95	\$2.39
NSF	2/19/2019	1/1/2019	(\$1,590.00)	(\$166.12)	(\$918.93)	(\$504.95)	(\$2.39)
POSTBWR	2/28/2019	1/1/2019	\$1,590.00	\$166.12	\$918.93	\$504.95	\$2.39
NSF	3/1/2019	1/1/2019	(\$1,590.00)	(\$166.12)	(\$918.93)	(\$504.95)	(\$2.39)
POSTBWR	3/8/2019	1/1/2019	\$1,590.00	\$166.12	\$918.93	\$504.95	\$2.39
NSF	3/11/2019	1/1/2019	(\$1,590.00)	(\$166.12)	(\$918.93)	(\$504.95)	(\$2.39)
POSTBWR	3/22/2019	1/1/2019	\$1,590.00	\$166.12	\$918.93	\$504.95	\$2.39
NSF	3/25/2019	1/1/2019	(\$1,590.00)	(\$166.12)	(\$918.93)	(\$504.95)	(\$2.39)
POSTBWR	4/1/2019	1/1/2019	\$4,873.31	\$166.12	\$4,202.24	\$504.95	\$3,285.70
POSTBWR	4/1/2019	2/1/2019	\$0.00	\$166.97	(\$803.29)	\$636.32	(\$1,718.98)
POSTBWR	4/5/2019	3/1/2019	\$1,590.00	\$167.82	\$785.86	\$636.32	(\$128.98)
NSF	4/8/2019	3/1/2019	(\$1,590.00)	(\$167.82)	(\$785.86)	(\$636.32)	\$128.98
POSTBWR	4/19/2019	3/1/2019	\$0.00	\$167.82	(\$804.14)	\$636.32	(\$1,718.98)
POSTBWR	4/19/2019	4/19/2019	\$0.00	\$0.00	\$131.37	(\$131.37)	\$131.37
POSTBWR	4/23/2019	4/23/2019	\$750.00	\$0.00	\$750.00	\$0.00	\$750.00
POSTBWR	4/26/2019	4/26/2019	\$840.00	\$0.00	\$840.00	\$0.00	\$840.00
NSF	5/1/2019	4/26/2019	(\$840.00)	\$0.00	(\$840.00)	\$0.00	(\$840.00)
POSTBWR	5/31/2019	5/31/2019	\$807.00	\$0.00	\$807.00	\$0.00	\$807.00
NSF	6/5/2019	5/31/2019	(\$807.00)	\$0.00	(\$807.00)	\$0.00	(\$807.00)
Other	6/10/2019	6/10/2019	\$0.00	\$0.00	(\$175.00)	\$0.00	(\$175.00)
POSTBWR	6/14/2019	4/1/2019	\$1,590.00	\$168.68	\$785.00	\$636.32	(\$128.98)
NSF	6/19/2019	4/1/2019	(\$1,590.00)	(\$168.68)	(\$785.00)	(\$636.32)	\$128.98
POSTBWR	6/20/2019	6/20/2019	\$807.00	\$0.00	\$807.00	\$0.00	\$807.00
NSF	6/21/2019	6/21/2019	(\$807.00)	\$0.00	(\$807.00)	\$0.00	(\$807.00)
POSTBWR	6/28/2019	4/1/2019	\$3,200.00	\$168.68	\$2,395.00	\$636.32	\$1,481.02
POSTBWR	6/28/2019	5/1/2019	\$0.00	\$169.54	(\$805.86)	\$636.32	(\$1,718.98)
NSF	7/1/2019	4/1/2019	(\$3,200.00)	(\$168.68)	(\$2,395.00)	(\$636.32)	(\$1,481.02)
NSF	7/1/2019	5/1/2019	\$0.00	(\$169.54)	\$805.86	(\$636.32)	\$1,718.98
POSTBWR	7/2/2019	4/1/2019	\$4,370.00	\$168.68	\$3,565.00	\$636.32	\$2,651.02

## Post Petition Payment History for:

Andrew D. Breighner  
BK Case No. 15-03172

Loan N

Redacted

POSTBWR	7/2/2019	5/1/2019	\$0.00	\$169.54	(\$805.86)	\$636.32	(\$1,718.98)
POSTBWR	7/9/2019	7/9/2019	\$0.00	\$262.74	(\$262.74)	\$0.00	\$262.74
POSTBWR	7/9/2019	6/1/2019	\$0.00	\$170.41	(\$800.94)	\$570.53	(\$1,653.19)
POSTBWR	7/9/2019	7/9/2019	\$0.00	\$0.00	(\$60.00)	\$0.00	(\$60.00)
POSTBWR	9/11/2019	9/11/2019	\$0.00	\$0.00	(\$100.00)	\$0.00	(\$100.00)
POSTBWR	9/25/2019	7/1/2019	\$5,104.35	\$171.28	\$4,362.54	\$570.53	\$3,451.16
POSTBWR	9/25/2019	8/1/2019	\$0.00	\$172.15	(\$742.68)	\$570.53	(\$1,653.19)
POSTBWR	9/25/2019	9/1/2019	\$0.00	\$173.03	(\$743.56)	\$570.53	(\$1,653.19)
POSTBWR	10/3/2019	10/3/2019	\$0.00	(\$45.00)	\$0.00	\$0.00	(\$45.00)
POSTBWR	10/23/2019	10/23/2019	\$0.00	(\$100.00)	\$0.00	\$0.00	(\$100.00)
POSTBWR	11/14/2019	10/1/2019	\$1,680.00	\$173.91	\$935.56	\$570.53	\$26.81
POSTBWR	12/26/2019	11/1/2019	\$1,653.19	\$174.80	\$907.86	\$570.53	\$0.00
POSTBWR	2/7/2020	12/1/2019	\$1,712.00	\$175.69	\$965.78	\$570.53	\$58.81
POSTBWR	3/5/2020	1/1/2020	\$1,711.97	\$176.59	\$964.85	\$570.53	\$58.78
POSTBWR	3/19/2020	2/1/2020	\$1,712.00	\$177.90	\$905.20	\$629.31	\$0.03

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**In re:** :  
 : **Case No.: 15-03172**  
**Andrew D. Breighner** : **Chapter 13**  
**Gaylynn L. Breighner** : **Judge Henry W. Van Eck**  
 : **\*\*\*\*\***

**Debtor(s)**

**U.S. Bank National Association, as** :  
**Indenture Trustee on behalf of and with** : **Related Document # 68**  
**respect to Ajax Mortgage Loan Trust** :  
**2018-B, Mortgage-Backed Notes** :

**Movant,**

**vs**

**Andrew D. Breighner**  
**Gaylynn L. Breighner**

**Charles J. DeHart III**

**Respondents.**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing Response to Notice of Final  
Cure was served on the parties listed below via e-mail notification:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

Charles J. DeHart III, Chapter 13 Trustee, 8125 Adams Drive, Suite A, Hummelstown, PA  
17036

Keith B. DeArmond, Attorney for Andrew D. Breighner and Gaylynn L. Breighner,  
DeArmond and Associates of York, LLC, 18 South George Street, Suite 610, York, PA  
17401, general.dearmondlaw@gmail.com

The below listed parties were served via regular U.S. Mail, postage prepaid, on March 25,  
2020:

Andrew D. Breighner and Gaylynn L. Breighner, 305 High Rock Road W, Hanover, PA  
17331

Andrew D. Breighner and Gaylynn L. Breighner, 305 High Rock Road, Hanover, PA 17331

18-024624\_SCS2

DATE: March 25, 2020

/s/ Karina Velter

Karina Velter, Esquire (94781)

Adam B. Hall (323867)

Sarah E. Barngrover (323972)

Manley Deas Kochalski LLC

P.O. Box 165028

Columbus, OH 43216-5028

Telephone: 614-220-5611

Fax: 614-627-8181

Attorneys for Creditor

The case attorney for this file is Karina Velter.

Contact email is [kvelter@manleydeas.com](mailto:kvelter@manleydeas.com)